

**Before the
Federal Communications Commission
Washington, DC 20554**

In re Petition of)	
)	
NATIONAL TRANSLATOR)	Docket No.
ASSOCIATION)	RM No. 10995
Westminster, CO)	
)	
For the Amendment of Part 74 of the)	
Commission's Rules to Provide)	
For Displacement Relief)	
For FM Translator Stations)	

To: The Commission

COMMENTS

It is impossible to believe that the situation exists whereby FM translators do not have an avenue for displacement. It should have been implemented at the time "window" filings were adopted.

We concur with the comments filed by the National Translator Association ("NTA") except for the wording for the proposed rule.

With regard to the proposed language of "significant interference received," the use of the word "significant" is vague and would only trigger arguments of exactly how "significant" is to be defined from now to eternity.

We suggest that the proposed rule state in part that: *"This displacement privilege shall also be available to an FM translator licensee/permittee which receives new or increased predicted interference to its protected contour as a result of new or changed main or auxiliary facilities from a primary FM station."*

We further believe that FM translator displacement should take a priority over any other pending non-displacement FM translator or Low-Power FM applications so long as the displacement application for the affected FM translator station is on file before any such auction, selection, or in the case of a singleton application; before the deadline for filing Petitions to Deny in response to a “proposed grant list.”

In summary, there is no question that an existing FM translator should be given all opportunities for the continuation of its service with minimal disruption caused by the implementation of a new or changed primary FM station and further that specific displacement rules be adopted to provide the maximum reliability for continuation of FM translator service.

Respectfully submitted,

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